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MEMO ENDORSED

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June 1, 2006

Hon. Kenneth M. Karas
Judge, U.S. District Court
United States Courthouse
500 Pearl Street – Rm. 2260
New York, N.Y. 10007-1312
Fax No: 212 805-7968

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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Re: *United States v. Alberto Vilar - 05 Cr. 0621*

Dear Judge Karas:

I am writing to request that Mr. Vilar be permitted to travel to attend this year's annual meeting of the American Society of Clinical Oncology (ASCO) on June 2nd through the 6th in Atlanta, Georgia.

I am informed by Mr. Vilar that ASCO's annual meeting is the single most important cancer research meeting in the United States. The meeting is convened to discuss the latest developments in cancer research; numerous scientific papers and the results of important clinical trials are presented by the world's leading experts.

Mr. Vilar has spent the majority of his career following developments in the molecular biology field of cancer research. Amerindo was apparently regarded as the largest investor in young companies in this specialty field, which it helped to pioneer. Indeed, the documents seized in the search, particularly those taken from Mr. Vilar's office, include voluminous research materials on cancer and new cancer treatments.

Mr. Vilar was on the Scientific Advisory and Resource Boards of two of the best known cancer research institutions in the country, at Columbia University and Harvard.

Without attending this essential scientific meeting, he has no hope of maintaining his expertise in the field. If he is acquitted after trial and attempts to return to work, he will be at a tremendous disadvantage by virtue of his inability to spend the lengthy stretch of time between arrest and trial productively.

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He is willing to abide by whatever conditions the court imposes, including calling into his pretrial services officer several times per day or having a government official accompany him to the meeting.

We therefore request that Mr. Vilar be permitted to travel this Friday through Tuesday to attend the meeting.

Thank you for your attention.

Very truly yours,

SUSAN C. WOLFE

cc: AUSA Marc Litt

Application is denied for the reasons
stated on the record of June 1, 2006

SO ORDERED

KENNETH M. KARAS U.S.D.J.

6/1/06